

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
ZAKIA PARVEEN and MAHMOOD SHAHID,

Plaintiffs,

-against-

WELLS FARGO BANK, N.A., ROSICKI,
ROSICKI & ASSOCIATES, P.C., and
SURESH BUDHOO,

Defendants.

-----X
COMPLAINT LONG ISLAND OFFICE

Jury trial requested

CV 22 3213

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MAY 31 2022

EDNY PRO SE OFFICE

Plaintiffs, appearing pro se, complaining of the defendants, allege the following, upon information and belief:

KOVNER, J

1. This action is initiated and arises under 18 U.S.C. § 1964, the so-called Civil RICO. statute. This court has jurisdiction under pursuant to 28 U.S.C. § 1331. Venue is proper pursuant to 28 U.S.C. § 1391(b).

2. Plaintiffs Zakia Parveen (“Parveen”) and Mahmood Shahid (“Shahid”), a married couple, reside at 362 Mill Road, Valley Stream, NY 11581.

3. At all relevant times, defendant Wells Fargo Bank, N.A. (“Wells”) is a national bank chartered in Delaware with a main office in Sioux Falls, SD.

4. At all relevant times, defendant Rosicki, Rosicki & Associates, P.C. (“RR&A”) is a law firm specializing in mortgages and foreclosures, having a place of business in Plainview, NY in the Eastern District of New York.

5. Suresh Budhoo is a resident of Nassau County and now owner in a foreclosure sale of 242 Mill Road, Valley Stream, NY 11581.

6. On or about May 5, 2008, Parveen executed a mortgage note to Wachovia Mortgage, FSB, which later merged into Wells. Parveen then executed a loan modification on or about July 20, 2010.

7. On December 4, 2018, the U.S. Attorney's Office announced settlement of civil fraud claims against RR&A, among others, wherein RR&A systematically generated false and inflated bills for foreclosure and eviction related expenses.

8. Plaintiffs were victims of defendants' RICO scheme in regard to their mortgage and loan modification.

9. As a result, plaintiffs' residence was foreclosed and sold and they face homelessness.

WHEREFORE, plaintiffs demand judgment against defendants and each of them, jointly and severally, in an amount to be determined by this Court and a declaratory judgment granting title to plaintiff's home, vacating the judgment of foreclosure and sale, and for such other and further relief that this Court may deem just and proper.

Dated: Valley Stream, NY
May 12, 2022

Zakia Parveen Mahmood Shahid
Zakia Parveen and Mahmood Shahid
Plaintiffs pro se
362 Mill Road
Valley Stream, NY 11581

**Zakia Parveen
362 Mill Road
Valley Stream, NY 11581
legal@cdmionline.com**

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ MAY 31 2022 ★

LONG ISLAND OFFICE

May 26, 2022

Clerk of the Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722
Attn: Pro Se Office

Dear Sir or Madam:

Please accept the following case for filing.

Please communicate with me via the above email.

Thank you.

Very truly yours,

Zakia Parveen

Zakia Parveen

Enclosure

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ MAY 31 2022 ★

LONG ISLAND OFFICE

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Clerk of the Court
Eastern District of New York
100 Federal Plaza
Central Islip NY 11722
USA



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